

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

POLYSCIENCES, INC.,

Plaintiff,

v.

JOSEPH T. MASRUD,

Defendant.

Case No. 20-cv-03649-PBT

**PLAINTIFF'S MOTION TO SEAL EXHIBIT**

Plaintiff Polysciences, Inc. ("Polysciences") moves the Court to seal a portion of a filing concurrently being submitted herewith. The motion is unopposed and, without taking a position on the substance of the material to be sealed, the relief requested is consistent with the parties' proposed confidentiality order submitted on September 2, 2020.

The filing subject to this motion is Polysciences' Motion to Compel Compliance with Subpoena, concurrently filed with this Motion to Seal. (Doc. No. 26). Polysciences references in that filing a letter received from non-party Mathew Griffin ("Griffin") in response to a subpoena issued on him earlier in the case. That letter is Exhibit E to Polysciences' Motion to Compel, and Polysciences is separately submitting it to the Court for its consideration on sealing. Griffin's letter supports the allegations contained in the Motion to Compel Compliance with Subpoena as he is the subject of the Motion.

On September 2, 2020, the parties submitted to Chambers for approval (by email per direction) an agreed proposed protective order for the treatment of discovery material. The Court has not yet addressed the proposed order, but the parties agreed to abide it pending the Court's determination.

Griffin previously raised with Polysciences his position that his letter contains confidential material that should be filed under seal per the proposed protective order. Without taking a position on the substance of Griffin's request, Polysciences does not oppose the request, and therefore respectfully moves the Court to enter the accompanying proposed order to place under seal Exhibit E to Doc. No. 26.

Respectfully submitted,

/s/ Eric E. Reed

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*Attorneys for Plaintiff*

Dated: December 3, 2020

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the below date, he filed the foregoing with the Court using the ECF system, which will provide notice and a copy to counsel of record.

In addition, a copy of the filing was e-mailed and mailed to Mathew Griffin at the following addresses:

mgriffin1705@gmail.com

1705 Morris Court  
North Wales, PA 19454

Date: December 3, 2020

/s/ Eric E. Reed

Eric E. Reed